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NOV 04 2011

DEQ-SWRO

November 3, 2011

Ms. Clairise Shaheen
Virginia Department of Environmental Quality
Southwest Regional Office
P.O. Box 1688
Abingdon, Virginia 24212

**Re: Permit Revoke and Reissuance, Coeburn-Norton-Wise Regional Wastewater Treatment Plant;
VPDES Permit No. VA0077828; CHA Project Number: 21510**

Dear Ms. Shaheen:

Enclosed is the original signed Virginia Pollutant Discharge Elimination System (VPDES) permit application for the Coeburn-Norton-Wise Regional Wastewater Treatment Plant (WWTP). Per our previous discussions, this application is submitted at this time for the revocation and reissuance of the current VPDES permit. This submittal includes Form 2A, the VPDES Sewage Sludge Permit Application Form, the DEQ Application Addendum, No Exposure Certification Form, and the Public Notice Billing Information Form. These documents are submitted by CHA Consulting, Inc. on behalf of the Coeburn-Norton-Wise Regional Wastewater Treatment Authority.

The current permit includes effluent limits for the current facility design flow of 5.0 million gallons per day (MGD) and an expanded facility design flow of 6.0 MGD. An expansion of the design capacity to 6.5 MGD with a potential additional increase to 7.0 MGD is currently in progress. As such, the Authority requests that the reissued permit include the current 5.0 MGD and 6.0 MGD tiers as well as tiers for future 6.5 MGD and 7.0 MGD design flows.

The current VPDES permit and the facility Sludge Management Plan include composting, land application, and placement in a landfill as sludge disposal options. We request that the reissued permit retain these three options.

This application is submitted at this time to support the following requests for waivers for the EPA Form 2A part of the application:

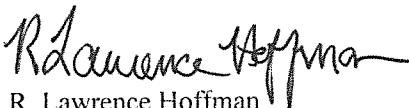
1. Part A.12 Bacteria Monitoring: The permit application indicates that bacteria monitoring be performed for fecal coliform. The VPDES permit requires that the bacteria monitoring performed be conducted for *E.coli* in accordance with the Virginia water quality standards. As such, the data provided in the application is for *E.coli*. The Authority requests that the requirement for fecal coliform analysis be waived and that the use of *E.coli* data be allowed.
2. Part B.6 Effluent Testing Data Requirements: The permit application indicates that a minimum of three scans must be performed on the parameters listed in Part B.6. For the parameters on this list that are included in the current permit with limitations, DMR data was submitted. The following parameters are not required as part of the current permit sampling, and are not routinely sampled and analyzed: TKN, nitrate plus nitrite, oil and grease, total phosphorus, and total dissolved solids. One sample was collected on September 14-15, 2011 for these parameters and the results provided on the application form. We request that the additional two scans be waived for these five parameters and that the data provided be considered representative of the effluent and sufficient for the application.

3. Part D. Expanded Effluent Testing Data Requirements: The permit indicates that facilities with 1.0 MGD flow and/or a pretreatment program collect three samples of an expanded list of parameters. The following waivers are requested for this application:
- The application indicates that at least three samples be collected and analyzed for this expanded list of parameters. Most of the parameters on this list were collected in August 2010 as part of the VPDES permit-required water quality criteria monitoring; the results of this monitoring were submitted as *Attachment A* to DEQ. These parameters are not collected on a routine basis by the WWTP, and as such, we request that the one pollutant scan be considered representative of the effluent and sufficient for this application.
 - The permit application form indicates that total recoverable metals data be provided. Dissolved metals data was provided instead since this data was previously collected by the WWTP to complete the water quality criteria monitoring requirements in the current VPDES permit. In addition, dissolved metals analysis is more appropriate since the Virginia Standards are based on the dissolved form. We request that this data be accepted instead of total recoverable metals data.
 - DEQ has not promulgated water quality criteria for the following fifteen (15) parameters, and as such, they were not required to be collected by the WWTP as part of the water quality criteria monitoring required by the VPDES permit: beryllium, total phenolic compounds, chloroethane, 2-chloro-ethylvinyl ether, 1,1-dichloroethane, p-chloro-m-cresol, 2-nitrophenol, 4-nitrophenol, benzo(ghi)perylene, bis(2-chloroethoxy)methane, 4-bromophenyl phenyl ether, 4-chlorophenyl phenyl ether, di-n-octyl phthalate, 2,6-dinitrotoulene, and phenanthrene. We request that data for these parameters not be required as part of the permit application.
4. Part E. Toxicity Test Data: The permit application indicates that testing for two species for acute and/or chronic toxicity be performed on an annual basis for four years or on a quarterly basis for four quarters during the past 12 months. The VPDES permit for this facility currently requires annual acute and chronic toxicity testing using fathead minnows (*Pimephales promelas*). The effluent used in this testing is believed to be representative of the current effluent. As such, the Authority requests that the requirement for the testing using a second species (*Ceriodaphnia*) be waived and that the use of the tests performed to fulfill current VPDES permit requirements be allowed.

The laboratory results for the monitoring used to prepare this application were submitted to DEQ previously with the DMRs for the sampling month.

Please do not hesitate to contact me (540) 552-5548 or Mark Hollyfield, CNW Regional Wastewater Treatment Authority Executive Director, at (276) 679-7236 should you have any questions or require any additional information.

Very truly yours,



R. Lawrence Hoffman
Vice President

RLH/mlc
Enclosure

cc: Mark Hollyfield, Executive Director, CNW Regional Wastewater Authority

